

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

ROSALEE WILSON, et al.,

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Plaintiffs

*

VS.

*

MICHAEL TURNER, et al.,

*

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Civil Case No. 13-3497 ELH

Defendants

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* * * * *

AFFIDAVIT IN SUPPORT OF
MOTION FOR ENTRY OF DEFAULT

I, Jane Santoni, being duly sworn, state as follows:

1. I am the attorney for the Plaintiffs, Quintel Wilson and Rosalee Wilson in the above-entitled action and I am familiar with the file, records and pleadings in this matter.

3. Defendant America's Financial Trust, LLC ("AFT") was served with a copy of the summons and complaint on January 15, 2014, as reflected on the docket sheet by the proof of service filed on April 24, 2014.

4. Defendant AFT filed an Answer to the Complaint on June 6, 2014, and an Answer to the Second Amended Complaint on September 3, 2014.

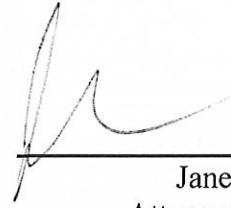
5. On October 17, 2014, counsel for Defendant AFT filed a Motion to Withdraw Appearance, which was granted by this Court on November 25, 2014.

6. Defendant AFT obtained new counsel, who entered her appearance on December 24, 2014. Counsel later moved to withdraw her appearance on April 3, 2015.

7. On April 7, 2015, this court gave Defendant America's Financial Trust, LLC 30 days to obtain new counsel. On August 6, 2015, this court directed AFT to show cause why a default should not be entered on claims against it, by August 20, 2015.

8. Defendant AFT has failed to obtain new counsel or otherwise defend this case within the time allowed and, therefore, is now in default.

6. Plaintiff requests that the clerk of court enter default against the Defendant America's Financial Trust, LLC

A handwritten signature in black ink, appearing to read 'Jane Santoni', is positioned above a horizontal line.

Jane Santoni, Esq.
Attorney for Plaintiffs